

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 18-MJ-1776

ALLISTER QUINTANA,

Defendant.

SECOND REQUEST FOR CONTINUANCE OF GRAND JURY PRESENTMENT

1. I am the defendant in this criminal proceeding.
2. I understand that I have a right to have my case presented to a grand jury within thirty (30) days of my arrest pursuant to 18 U.S.C. § 3161(b). I previously agreed to extend the deadlines in which the government must indict me. I initially agreed to a 60-day extension filed on June 6, 2018.
3. I hereby request a continuance of grand jury presentment for an additional period not to exceed 30 days from the date of my arrest for a total loss of 120 days. By that I mean that there be an additional 30 day period of excludable time for the purposes of determining compliance with the speedy indictment provision of 18 U.S.C. § 3161(b). I further request that an Order be entered affirming that this time period shall be excluded from speedy Indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).
4. Continuing the grand jury presentment will allow my attorney to attempt to negotiate a pre-Indictment plea agreement with the government, whose terms may be

more acceptable to me than those of an agreement entered after an indictment has been issued.

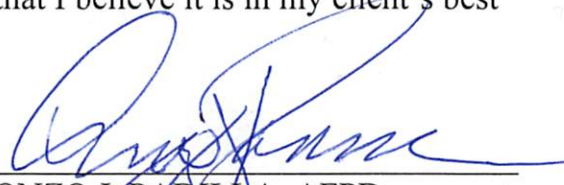
5. This request for a continuance of Grand Jury Presentment is not predicated upon the congestion of the Court's docket.

6. Assistant United States Attorney Joseph Spindle does not oppose this request to extend Grand Jury Presentation and in fact concurs with this request.

7. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to a grand jury at a later date, consistent with this waiver.


for ALLISTER QUINTANA

I have reviewed the foregoing document with my client and represent to the Court that he understands it. I further present to the Court that I believe it is in my client's best interest to agree to the contents of this document.


ALONZO J. PADILLA, AFPD
Attorney for Defendant

Date: 7/27/2018